

FILED IN CHAMBERS  
U.S.D.C ATLANTA

Date: Mar 08 2022

**United States District Court**  
NORTHERN DISTRICT OF GEORGIA

KEVIN P. WEIMER, Clerk

By: s/Kevin Morris  
Deputy Clerk

UNITED STATES OF AMERICA

v.

**CRIMINAL COMPLAINT**Darren Devon Burroughs; Lisa Jennifer Easton; India  
Goodman; Purcell Frizzell Lipscomb; and Derrick Vaughn

Case Number: 1:22-MJ-0196

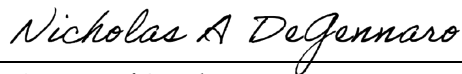
I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about March 7, 2022 in Clayton County, in the Northern District of Georgia, defendant(s) did, conspire to make a false and fictitious statement to a federally licensed firearms dealer with the intent to deceive said firearms dealer with respect to a fact material to the lawfulness of the sale of a firearm; conspire to transfer, sell, trade, give, transport, or deliver any firearm(s) to any person who the transferor knew or had reasonable cause to believe does not reside in the state in which the transferor resides; and possess a firearm as a prohibited person,

in violation of Title 18, United States Code, Sections 371 and 922(g)(1).

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

PLEASE SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof. Yes



Signature of Complainant  
Nicholas A. DeGennaro

Based upon this complaint, this Court finds that there is probable cause to believe that an offense has been committed and that the defendant has committed it. Sworn to me by telephone pursuant to Federal Rule of Criminal Procedure 4.1.

March 8, 2022

Date

at Atlanta, Georgia

City and State

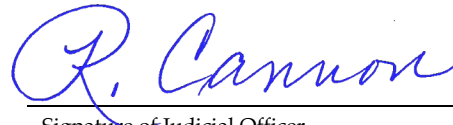
REGINA D. CANNON

UNITED STATES MAGISTRATE JUDGE

Name and Title of Judicial Officer

AUSA Gregory E. Radics / 2022R00230 /

Gregory.radics@usdoj.gov



Signature of Judicial Officer

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A COMPLAINT**

I, Nicholas A. DeGennaro, depose and say under penalty of perjury:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), and have been so employed since January 2009. I am currently assigned to the Atlanta Group I, which is involved in investigating various facets of firearms trafficking. I am a graduate of the Federal Law Enforcement Training Center and the ATF National Academy. Prior to becoming an ATF Special Agent, I was an Investigator with the DeKalb County District Attorney's office and the Fulton County District Attorney's Office. I also hold a bachelor's degree in Criminal Justice from State University of New York Brockport, NY.

2. During my tenure as an ATF Special Agent, I have received specific training on FFL burglaries, firearms trafficking and interviewing. I have participated in large scale investigations resulting in the arrest and prosecution of offenders at the federal level. As part of those investigations, I have conducted or personally participated in both physical and electronic surveillance. I have also been involved in the execution of various types of search and arrest warrants. I have personally conducted and/or assisted in investigations of criminal acts involving violation of Title 18, United States Code, Section 922(g)(1) [Felon in Possession of a Firearm]. As an ATF SA, I am an "investigative or law enforcement officer of the United States" within the meaning of 18 U.S.C. § 2510(7). Therefore, I am

empowered to conduct investigations of and to make arrests for offenses enumerated in 18 U.S.C. § 2516.

3. The facts contained in this affidavit come from my personal observations, ATF records/documents, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show that there is sufficient probable cause for the requested complaint and does not set forth all of my knowledge about this matter.

4. Based on the facts below, there is probable cause that Darren Devon BURROUGHS, Lisa Jennifer EASTON, India GOODMAN, Purcell Frizzell LIPSCOMB, and Derrick VAUGHN have violated Title 18, United States Code, Section 371 [conspiracy to make a false and fictitious statement to a federally licensed firearms dealer with the intent to deceive said firearms dealer with respect to a fact material to the lawfulness of the sale of a firearm; conspire to transfer, sell, trade, give, transport, or deliver and firearm(s) to any person who the transferor knew or had reasonable cause to believe does not reside in the state in which the transferor resides].

5. In addition, there is probable cause that Darren Devon BURROUGHS, India GOODMAN, Purcell Frizzell LIPSCOMB, and Derrick VAUGHN have violated Title 18, United States Code, Section 922(g)(1) [Felon in Possession of a Firearm].

#### **PROBABLE CAUSE**

6. On March 7, 2022, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Special Agents, received information from an employee of Moss Pawn Shop (MPS),

a Federal Firearms Licensee (FFL), 6382 Old Dixie Highway, Jonesboro, Georgia, 30236 regarding suspected straw purchasing activity.

7. The employee explained that earlier during that day, Lisa Jennifer EASTON, purchased four firearms from the business. The employee explained that they were not present at the business when EASTON purchased the original four (4) firearms. However, they were notified afterwards that she (EASTON) had returned to the business to exchange one of the firearms (Smith and Wesson, Bodyguard, .380 pistol) for a Taurus model G2C. The employee said that this type of exchange was not typical and became concerned that EASTON had straw purchased the firearms for an unknown person. SA Dorman asked the employee if they could delay the transaction until agents could respond to conduct surveillance.

8. A straw purchase of firearms is the acquisition of firearm(s) from an “FFL” by an individual (the “straw”), for the purpose of concealing the identity of the true intended receiver of the firearm(s). The “actual purchaser” is often the person who is prohibited from purchase who seeks to obtain the firearm through the “straw purchaser.”

9. The employee agreed to delay the firearms transaction. The MPS employee provided SA Dorman a copy of EASTON’s Georgia Driver’s License and Georgia Concealed Weapons permit. The employee told SA Dorman that EASTON was wearing a navy-blue T-shirt.

10. Agents arrived at MPS and, shortly thereafter, SA Dorman observed EASTON exit MPS accompanied by two unidentified women. EASTON was carrying a white plastic bag. The white plastic bag contained a square item which was consistent with

the original packaging of a Taurus pistol. SA Dorman saw EASTON and the two unidentified females enter a blue four door Dodge Dart bearing Georgia license plate RXA8763 which was parked in the parking lot of MPS. EASTON was the driver.

11. Agents followed the vehicle as it departed MPS and drove directly to Intown Suites located at 363 Forest Parkway, Forest Park, Georgia, 30297. The vehicle parked and SA DeGennaro saw all three females enter room 218. SA DeGennaro observed an unidentified black male who was wearing a Kiss T-Shirt standing outside of room 218. That individual was later identified as Darrick VAUGHN (DOB:12/15/1986).

12. SA Dorman and SA DeGennaro also observed one of the women later identified as Patrice Devear MARSHALL (DOB:12/24/1990) exit the hotel room (218) and place a white plastic bag in the trunk of a blue Lexus ES350 bearing Maryland plate number 8EV5048. The white plastic bag was consistent with the type of merchandise bags MPS used and appeared to contain a square box consistent with the original packaging of Taurus pistols.

13. After MARSHALL placed the item in the trunk of the vehicle, she got in the front passenger side of the Lexus. MARSHALL was followed by an unidentified black male from room 218 who was wearing a white T-Shirt later identified as Purcell LIPSCOMB (DOB: 12/29/1969) who entered the driver's seat of the Lexus. SA DeGennaro saw a second black female exit room 218 later identified as India GOODMAN (DOB:02/08/1986) enter the Lexus on the rear driver's side. Then SA DeGennaro saw VAUGHN exit room 218 carrying three black firearm boxes (two Taurus boxes and one SCCY box) and place them in the rear passenger side of the Lexus.

14. A query of law enforcement databases revealed that the Lexus was registered to LIPSCOMB. ATF Agents followed the Lexus a short distance away from the hotel and, utilizing the emergency equipment in their government vehicles, detained the Lexus in the parking lot of Park Manor Apartments located at 460 Main Street, Forest Park, Georgia, 30297.

15. Agents identified the occupants of the vehicle: LIPSCOMB (driver), MARSHALL (front seat passenger), GOODMAN (rear seat driver side), and VAUGHN (rear seat passenger side). Agents observed the three firearms boxes VAUGHN carried out of room 218 on the floorboard area in front of where VAUGHN was seated.

16. Agents queried the National Crime Information Center (NCIC) Criminal History (CH) report of everyone.

17. LIPSCOMB's CH report revealed he was convicted of the following felonies and or misdemeanors with a sentence over one year out of Maryland: larceny of a motor vehicle in 1988: sentenced to one year and six months, Malicious Destruction in 1988: Received a sentence of one year and six months, Assault and Theft in 1989: Received a sentence of one year and six months, Battery in 1996: Received a sentence of one year suspended and received two years and three months' probation, Attempted 1st degree murder in 2001: Received a sentence of twenty-five years.

18. VAUGHN's CH revealed he was convicted of the following felonies and or misdemeanors with a sentence over one year out of Maryland: Handgun on person in 2005: Received a sentence of five years, Distribution of narcotics in 2013: Received a sentence of six years and nine months.

19. GOODMAN's CH revealed she was convicted of the following felonies and or misdemeanors with a sentence of over one year out of Maryland: Possession with intent to manufacture/distribute of narcotics in 2004: Received three years' probation, Possession with intent to manufacture/distribute of narcotics in 2005: Received five years, Possession with intent to manufacture/distribute narcotics in 2013: Received a sentence of sixteen years.

20. According to NCIC, MARSHALL's CH did not reflect any felony convictions. MARSHALL agreed to speak with agents but denied any involvement with the firearms.

21. LIPSCOMB, VAUGHN and GOODMAN were detained and transported to the Forest Park Police Department for further interview.

22. Agents searched the Lexus and located the following items:

- Taurus, model G2C, 9mm pistol, S/N: 1C108493. Found on the floorboard in the middle of the rear seats
- Taurus, model G2C, 9mm pistol, S/N: 1C107562. Found on the floorboard in the middle of the rear seats.
- SCCY, model CPX-2, 9mm pistol, S/N: C264489. Found on the floorboard in the middle of the rear seats.
- Two 50 round boxes of ammunition. Found in VAUGHN's backpack.
- Honor Defense, model Honor Guard, 9mm pistol, S/N: 0000824. Found in purse in the trunk alongside a piece of paper bearing LIPSCOMB's name.

- Hi-Point, .40 caliber pistol, S/N: 702431, with a magazine containing eight rounds of ammunition, plus one additional round of ammunition in the chamber. Found in purse in the trunk alongside a piece of paper bearing LIPSCOMB's name.
- Taurus, model G3C, .40 caliber pistol, S/N: ACN726236. Found in the trunk of the vehicle.

23. Agents conferred with an ATF Interstate NEXUS expert who advised one or more of the referenced firearms had travelled in or effected interstate commerce.

24. Agents interviewed EASTON and her boyfriend, Darren BURROUGHS, at Intown Suites (Room #218) located at 363 Forest Parkway, Forest Park, Georgia, 30297. Prior to the interview, SA Dorman asked if there were firearms in their hotel room and EASTON and BURROUGHS said there were and gave their consent to remove the firearms prior to the interview.

25. EASTON told SA Dorman the firearms were in a diaper bag and her (EASTON's) purse. SA Dorman removed a Ruger, PC Charger, 9mm pistol, serial number 913-09103 from the diaper bag, a Taurus GX4, 9mm pistol, serial number 1GA04196 from EASTON's purse and an American Tactical, Omni Hybrid multi caliber pistol, serial number NS298282 wrapped in a jean jacket lying on the bed.

26. EASTON told ATF Agents that she knew GOODMAN, LIPSCOMB, VAUGHN, and MARSHALL all resided in the state of Maryland. Agents later found Maryland ID cards for GOODMAN, LIPSCOMB, VAUGHN, and MARSHALL.



27. Agents conferred with an ATF Interstate NEXUS expert who advised one or more of the referenced firearms had travelled in or effected interstate commerce.

28. SA Dorman asked EASTON who the jean jacket belonged to. EASTON said the jacket belonged to her husband (BURROUGHS) but claimed the firearm was hers. Also removed from the diaper bag was a Glock, model 22, .40 caliber pistol, serial number BSLT048 loaded with twenty-nine rounds of ammunition. All of the firearms in the hotel room were accessible to BURROUGHS.

29. BURROUGH's CH revealed he was convicted of the following felonies and or misdemeanors with a sentence of over a year out of Maryland: Possession with intent to manufacture/distribute of narcotics: Received five years, Assault in the second degree: Received eighteen months.

30. EASTON also advised agents she knew the firearms she purchased for GOODMAN, VAUGHN and LIPSCOMB were going to Baltimore. EASTON stated she received a total of \$200 for purchasing the firearms, \$100 from each couple (GOODMAN and VAUGHN) and (LIPSCOMB and MARSHALL).

### **CONCLUSION**

31. Based on the foregoing, I respectfully submit probable cause exists to believe Darren Devon BURROUGHS, Lisa Jennifer EASTON, India GOODMAN, Purcell Frizzell LIPSCOMB, and Derrick VAUGHN have violated Title 18, United States Code, Section 371 [conspiracy to make a false and fictitious statement to a federally licensed firearms dealer with the intent to deceive said firearms dealer with respect to a fact material to the lawfulness of the sale of a firearm; conspire to transfer, sell,

trade, give, transport, or deliver and firearm(s) to any person who the transferor knew or had reasonable cause to believe does not reside in the state in which the transferor resides] and that Darren Devon BURROUGHS, India GOODMAN, Purcell Frizzell LIPSCOMB, and Derrick VAUGHN have violated Title 18, United States Code, Section 922(g)(1) [Felon in Possession of a Firearm].